

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE BAYOU HEDGE FUND INVESTMENT
LITIGATION

06 MD 1755 (CM)

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THIS DOCUMENT RELATES TO:
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BROAD-BUSSEL FAMILY LIMITED
PARTNERSHIP, MARIA LOUISE
MICHELSON, MICHELLE MICHELSON, and
HERBERT BLAINE LAWSON, JR., Individually
and on Behalf of All Other Persons and Entities
Similarly Situated,

No. 06 Civ. 3026 (CM)

Notice of Motion to Determine the
Eligibility of Claims of Putative
Class Members for NASD
Arbitration

Plaintiffs,

vs.

BAYOU GROUP LLC, et al.,

Electronically Filed

Defendants.

TO: Marvin Pipkin
Pipkin, Oliver & Bradley, LLP
1020 N.E. Loop 410, Suite 505
San Antonio, Texas 78209
Attorneys for Travis Co. J.V., Roger Hill, Sr. and
Christopher Hill ("Putative Class Members")

SIRS:

PLEASE TAKE NOTICE that on the Declaration of Matthew Wolper, the documents attached thereto and accompanying Brief, the undersigned, attorneys for Defendant E. Lee Hennessee, will move this Court before the Honorable Colleen McMahon, U.S.D.J. at the United States District Court for the Southern District of New York located at 300 Quarropas Street,

White Plains, New York, at a time and date convenient to the Court, for an Order declaring that the claims alleged by Travis Co. J.V., Roger Hill, Sr. and Christopher Hill (“Putative Class Members”) are ineligible for NASD arbitration because their claims are encompassed by the putative class action.

Dated: June 19, 2006

BRESSLER, AMERY & ROSS, P.C.
2801 SW 149th Avenue, Suite 300
Miramar, Florida 33027
Attorneys for Defendants
Hennessee Group LLC,
Elizabeth Lee Hennessee and
Charles Gradante

By: /S/
Matthew Wolper (MW 8835)

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2006, a copy of the *Motion to Determine the Eligibility of Claims of Putative Class Members for NASD Arbitration* was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

_____/S/_____
Matthew Wolper (MW 8835)